

Exhibit A – Vincent Systems’ Final Proposed Claim Constructions and Evidence

Pursuant to Western District of Tennessee Local Patent Rule 4.5(b), Plaintiff Vincent Systems GmbH (“Vincent Systems”) hereby provides its Constructions of the Claim Terms in Dispute and Supporting Evidence.

Claim Language	Vincent Systems’ Final Proposed Construction	Supporting Evidence
“servo drive”	This phrase should be given its plain and ordinary meaning.	<ul style="list-style-type: none">• Asserted Patent at 2:14-16: “Furthermore, a servo drive is envisaged for the first hinge connection. This servo drive encloses a motor with or without integrated gear transmission to a drive shaft.”• Asserted Patent at 3:60-4:1 “FIG. 2 shows a sectional view of a finger element. A motoric drive [11] for a threaded screw 13 that is directly attached to the drive shaft 12 is arranged inside a pipe-shaped first phalanx 5.”• Asserted Patent at 4:9-14: “The drive 11 encloses at least an electric motor as servo member, optionally also a gearing unit and/or for a use for instance as autarkic finger-prosthesis an electric voltage source as well as control electronics (battery, accumulator etc.), wherein in particular the latter components may be also arranged in the core 15 of the second phalanx 6.”• Asserted Patent at FIG. 2.• Initial Claim Construction Declaration of Steven Collins, Ph.D. (“Collins Initial Decl.”), ¶¶ 32-38• Ben-Tzvi 4/3 Trans. at 105:13-106:17.• Ben-Tzvi Decl. at ¶ 46.• VINCENT_004194 at 4201• Rebuttal Claim Construction Declaration of Steven Collins, Ph. D. (“Collins Rebuttal Decl.”), ¶¶ 2-11• MC0006458, MC0006434, MC0006452, MC0006460• Collins Trans. at 33:2-37:4• VINCENT_004288 at 4304 (original German application claim 1)

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		<ul style="list-style-type: none"> • Vincent Systems' Initial Infringement Contentions • Defendants' Initial and Supplemental Non-Infringement Contentions • Vincent Systems may also rely on the intrinsic and extrinsic evidence cited in Exhibit B - Defendants' Final Proposed Claim Constructions and Evidence
<p>"a coupling mechanism between the first hinge connection and second hinge connection"</p>	<p>This phrase should be given its plain and ordinary meaning.</p>	<ul style="list-style-type: none"> • Asserted Patent at Abstract: "further comprising a coupling mechanism (8) between the first and second articulated connections." • Asserted Patent at 3:3-11: "The coupling mechanism encloses preferably at least one elastic connection, for instance in form of a pull- and push-rod between the carrier component and the second phalanx in parallel to the first phalanx. The coupling mechanism consists further preferred of one or two spring bar connections (for instance spring wire or spring steel sheet) that engage eccentrically to the rotation axes of the first and second hinge connections to the respectively adjacent carrier components and second phalanx respectively." • Asserted Patent at 3:39-59: "The shown embodiments of the finger element enclose each a carrier component 1 with a first hinge axis 2 and gear segment 3 with several cog segments 4. The carrier component 1 comprises not further explained means like mounting holes for the fixation of the finger elements for instance at a hand-prosthesis (cf. FIGS. 3a and b). The first hinge axis 2 serves at the same time as support of the gear segment and as rotation axis for the first phalanx 5. The first phalanx 5 is in return connected with the second phalanx 6 via a second hinge connection, wherein the second hinge axis 7 forms the rotation axis for the second phalanx. The rotation movement of the first and second phalanges around the

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		<p>according rotation axes is coupled via a coupling mechanism (<i>cf.</i> FIG. 1 a to c and FIG. 4 a to d). This coupling mechanism encloses in the example embodiments two elastic spring bar connections 8 that are arranged in parallel to each other at both sides of the first phalanx 5, wherein the spring bar connections 8 each engage at the carrier component and at the second phalanx pivotably in an according bearing bore 9 and 10 respectively eccentrically to the first 2 and second 7 hinge axis respectively.”</p> <ul style="list-style-type: none"> • Asserted Patent at claim 7: “The finger element according to claim 1, wherein the coupling mechanism comprises at least an elastic connection between the carrier component and the second phalanx in parallel to the first phalanx.” • Asserted Patent at FIGs. 1a-c and FIGs. 4a-d • Collins Initial Decl., ¶¶ 39-44 • Collins Rebuttal Decl., ¶¶ 12-19 • Collins Trans. at 73:5-75:8 • Ben-Tzvi Decl. at ¶¶ 55-57, 60 • Ben-Tzvi 4/3 Trans. at 142:4-11, 150:25-151:15, 159:6-163:15, 195:11-18 • Ben-Tzvi 4/15 Trans. at 279:10-286:21 • US 11,305,420 at 10:3-11, Figs. 12a-b • Vincent Systems’ Initial Infringement Contentions • Defendants’ Initial and Supplemental Non-Infringement Contentions • Excerpt from Webster’s New World Dictionary, Third College Edition (MC0006353-6355) • Excerpt from The American Heritage College Dictionary, Fourth Edition (MC0006332-6334) • Declaration of Dr. Ben-Tzvi in <i>Stryker Corp. v. Ferno-Washington, Inc.</i>, No. 1:22-cv-00588-MRB (S.D. Ohio) • Vincent Systems may also rely on the intrinsic and extrinsic evidence cited in

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<p>“axially movable as well as “guided in axial direction by separate guidances”</p>	<p>“is pushed onto the drive shaft as well as limited in its axial movement by separate guidances preferably without play”</p>	<ul style="list-style-type: none"> • Asserted Patent at Abstract: “The object is achieved in that the threaded worm is positively mounted axially movably on the drive shaft and axially guided through separate guides.” • Asserted Patent at 2:28-34: “An essential feature of the invention encloses a decoupling of drive shaft and threaded screw in axial direction to the drive shaft. The threaded screw is preferably attached to the drive shaft and is in rotation direction form-fittingly coupled to the drive shaft, for instance via a cogging or a matched joint. Therefore, the axial movability of the drive shaft in the threaded screw has to be assured.” • Asserted Patent at 2:35-38: “Thus, the motor does not serve via the drive shaft as axial guidance of the threaded screw, but separate guidances. They are arranged preferably in form of sliding guidances at both front edges of the threaded screw.” • Asserted Patent at 1:39-44: “However, in these finger elements, the worm gear is fixed permanently to the motor shaft, such that in case of an applied load of the finger element high forces may affect the motor. An early drive- or motor-damage as well as a blocking of the worm drive under load is abetted therewith.” • Asserted Patent at 3:60-4:1: “FIG. 2 shows a sectional view of a finger element. A motoric drive ii for a threaded screw 13 that is directly attached to the drive shaft 12 is arranged inside a pipe-shaped first phalanx 5. The threaded screw is connected to each other via a not further explained key-slot-connection in rotation direction form fittingly, but axially movable pushed onto the drive shaft. The threaded screw is in the embodiment guided in radial direction onto the drive

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		<p>shaft, but is limited in its axial movability by two guidances 14 preferably without play.”</p> <ul style="list-style-type: none"> • Asserted Patent at FIGs. 1-4. • Asserted Patent File History at 3/20/2013 Notice of Allowance: “Statement of reasons for allowance: The threaded screw ‘supported on the drive shaft form fittingly and axially movable as well as guided in axial direction by separate guidances’ (last three lines of claim 1) in the finger element as claimed is neither taught nor fairly suggested in the prior art.” • Collins Initial Decl., ¶¶ 45-52 • Collins Rebuttal Decl., ¶¶ 20-37 • Collins Trans. at 117:4-14, 116:23-117:3, 119:8-120:18, 120:19-122:15, 129:5-130:11, 130:12-131:22, 132:2-134:20, 218:22-219:2 • Ben-Tzvi Decl. at ¶¶ 26, 62 • Ben-Tzvi 4/3 Trans. at 204:9-19 • Ben-Tzvi 4/15 Trans. at 276:10-278:11, 290:2-292:12 • MC0006404 at 6406 • MC0006407 at 9409 • Ben-Tzvi Reb. Decl. at ¶¶ 12-13 • MC0001408 at 1672 • MC0003764 at 3768-3770 • Declaration of Dr. Ben-Tzvi in <i>Iottie Inc. v. Merkurs Innovations</i>, No. 2:15-cv-06597-KM-JBC (D.N.J.) • U.S. Patent No. 9,616,948 at Abstract, 6:35-44, FIG. 2, FIG. 11 • Ben-Tzvi, <i>et al.</i>, “Data Driven Calibration and Control of Compact Lightweight Series Elastic Actuators for Robotic Exoskeleton Gloves,” IEEE Sens J. 2021 October • Vincent Systems’ Initial Infringement Contentions • Defendants’ Initial and Supplemental Non-Infringement Contentions • Vincent Systems may also rely on the intrinsic and extrinsic evidence cited in

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